

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

| | | |
|---------------------------------------|---|------------------------|
| Michael J. Elli, |) | |
| |) | |
| individually and on behalf of those |) | |
| similarly situated, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | No. 4:13-cv-711-HEA |
| |) | |
| City of Ellisville, Missouri; et al., |) | |
| |) | |
| Defendants. |) | |
| |) | |

Joint Motion to Stay Case Management Deadlines

Come now the parties and jointly move the Court enter its order staying all CMO deadlines in this matter for twenty-one days. In support, Plaintiff states:

1. Plaintiff filed this action pursuant to 42 U.S.C. § 1983, seeking damages, declaratory judgment, and injunctive relief.

2. The parties have reached a tentative settlement of all claims raised in Plaintiff's Amended Complaint; however, final approval of the settlement has not been achieved and additional time may be required to obtain it.

3. The deadlines for initial disclosures and the initial phase of discovery are approaching; therefore, the parties jointly request a stay of twenty-one days to avoid the unnecessary expenditure of time and resources.

WHEREFORE the parties jointly move this Court for entry of an order staying all deadlines in this case for period of twenty-one days, directing the parties to advise the Court of the status of the tentative settlement no later than April 9, 2014, and allowing such other and further relief as is just and proper under the circumstances.

Respectfully submitted,

/s/ Peter J. Dunne

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was filed by way for the court's ECF/CM system on March 19, 2014, and served on counsel by operation of the ECF/CM system.

/s/ Anthony E. Rothert